

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-23 are currently pending in this case. Claims 1, 7, 13, 14, and 23 have been amended by the present Amendment. No new matter has been added.

In the outstanding Office Action, Claims 1-3, 5-9, 11-17, and 19-23 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent 5,768,483 by Maniwa et al. (hereinafter Maniwa). Claims 4, 10, and 18 were rejected under 35 U.S.C. §103(a) as being unpatentable over Maniwa in view of U.S. Patent 5,459,579 by Hu et al. (hereinafter Hu).

Claim 1 recites a multi-function apparatus comprising a plurality of image forming apparatuses, a buffer memory, a data transmission mechanism and a connector. Each image forming apparatus has a controller including a program memory for storing a program used by the respective image forming apparatus. The data transmission mechanism connects plural of the image forming apparatuses to each other and to the buffer memory, so as to allow a data transmission therebetween. The connector connects an external storage containing programs to be used by the image forming apparatuses, to the buffer memory, so as to allow a data transmission from the external storage to the buffer memory. When the external storage is connected to the connector, the programs stored in the external storage are transmitted to the buffer memory through the connector, and are then downloaded into the program memory included in the respective controllers of the image forming apparatuses, through a data transmission using the connected data transmission mechanism.

Independent Claim 1 has been amended to positively recite that the data transmission mechanism configured to connect plural image forming apparatuses is also connected to the buffer memory. Amended Claim 1 also clarifies that the connector is connected to the buffer

memory. The amendments are supported by the originally filed specification and figures.<sup>1</sup> The independent claims 7,13,14, and 23 have been amended to include similar positively recited features. No new matter has been added.

Applicant respectfully submits that none of the references cited by the Office Action, individually or in combination, teaches or suggests all the elements of the independent claims. Specifically the cited references do not disclose “a plurality of image forming apparatuses, each comprising a controller including a program memory for storing a program used by each of said plurality of image forming apparatuses... ”.

Maniwa discloses a multifunction apparatus including a fax machine, a scanner, and a printer illustrated in Figures 1 and 3. However, the image forming apparatuses do not each have a controller including a program memory for storing a program used by the respective image forming apparatus. In Figure 1 of Maniwa, a scanner/printer controller and a copier controller are illustrated, but the controllers are not dedicated to serve a specific image forming apparatus and contain no memory. In Figure 3 of Maniwa, no controllers are represented, and the image forming apparatuses dedicated memories for storing data (303) or software (302) are outside the respective image forming apparatuses and are not included in a controller.

Hu's teachings do not cure the above noted deficiency in disclosing all the elements of the multifunction apparatus. In Hu, the multifunctional local peripheral device has one single control module for the scanning means, the fax, and the printer illustrated (Figure 1). Since the apparatuses disclosed by Maniwa and Hu do not comprise a plurality of image forming apparatuses, each including a controller having a program memory for storing a program, they can not teach or suggest the feature recited in Claim 1 that “... when said external storage is connected to said connector, said data of said programs stored in said

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<sup>1</sup> Specification, Fig. 3, page 6 line 12 to page 7 line 9.

external storage are transmitted to said buffer memory through said connector and are downloaded into said program memory included in said controller of each of said plurality of image forming apparatuses, respectively, through a data transmission using said data transmission mechanism.”

The embodiment presented in “Description of the related arts” section of Applicant’s specification (Figure 1) is closer to the applicant disclosed multifunction apparatus than the teachings of the cited references. In Figure 1 each image forming apparatus has a controller including a program memory, and a connector that can be used to connect to an external storage device. In this case, the software downloading is done uncorrelated, on individual basis, for each image forming apparatus. However, Figure 1, as discussed, does not teach or suggest the feature stated in Claim 1 “... when said external storage is connected to said connector, said data of said programs stored in said external storage are transmitted to said buffer memory through said connector and are downloaded into said program memory included in said controller of each of said plurality of image forming apparatuses, respectively, through a data transmission using said data transmission mechanism.”

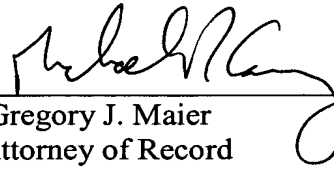
The non-limiting embodiment of Applicant’s invention illustrated in Figure 3, shows only one connector, because the downloading of program data from an external storage device is performed for all image forming apparatuses, using the buffer memory. The program data corresponding to each image forming apparatus is then downloaded into the program memory included in the respective controller, through a data transmission mechanism.

Applicant submits the inventions defined by independent Claims 1, 7, 13, 14, 23, and all claims depending therefrom, are patentably distinguishable from the asserted prior art for at least the reasons stated above.<sup>2</sup>

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance, and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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<sup>2</sup> MPEP § 2142 "...the prior art reference (or references when combined) must teach or suggest **all** the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)."